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AUG 26 2021

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
BY CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
DEPUTY

UNITED STATES OF AMERICA

v.

FODAY NABIE,

Defendant

CRIMINAL NO.

PX 21 CR 335

(Interstate Transportation of Stolen  
Property, 18 U.S.C. § 2314; Aiding and  
Abetting, 18 U.S.C. § 2; Forfeiture, 18  
U.S.C. § 981(a)(1)(C), 21 U.S.C. § 853(p),  
28 U.S.C. § 2461(c))

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INFORMATION

COUNT ONE

(Interstate Transportation of Stolen Property)

The Acting United States Attorney for the District of Maryland charges that:

On or about January 29, 2020, in the District of Maryland and elsewhere, the defendant,

**FODAY NABIE,**

did transport, transmit, and transfer in interstate and foreign commerce goods, wares,  
merchandise, and money, of the value of \$5,000 or more, knowing the same to have been stolen  
and converted.

18 U.S.C. § 2314

18 U.S.C. § 2

**FORFEITURE ALLEGATION**

The Acting United States Attorney for the District of Maryland further charges that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 981(a)(1)(c), 982(a)(2), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), in the event of the defendant's conviction under Count One of this Information.

**Transportation of Stolen Property Forfeiture**

2. Upon conviction of the offense alleged in Count One of this Information, the defendant,

**FODAY NABIE,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including, but not limited to, approximately \$2,500 in U.S. Currency seized during execution of a search warrant on January 29, 2020.

**Substitute Assets**

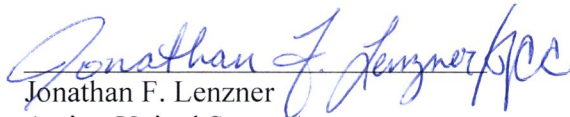
3. If, as a result of any act or omission of the defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty,

the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above.

18 U.S.C. §§ 981(a)(1)(C) and 982(a)(2)  
21 U.S.C. § 853(p)  
28 U.S.C. § 2461(c)

Date: 8/26/21

  
Jonathan F. Lenzner  
Acting United States Attorney